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7 Attorneys for Defendant
WALMART INCORPORATED

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**
11

12 KATRINA PASLEY, an individual,

13 Plaintiff,

14 vs.

15 WALMART INCORPORATED, a Foreign
Corporation; DOE INDIVIDUALS I through
16 XX, ROE LEGAL ENTITIES I through XX,
inclusive,

17 Defendants.
18

CASE NO. 2:23-CV-00946-ART-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DISCOVERY
DEADLINES
(FIRST REQUEST)**

19
20 Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and
21 LR 26-4, the parties, by and through their respective counsel of record, stipulate and agree
22 that there is good cause to extend discovery deadline as set forth below.

23 **A. Pursuant to LR 26-4(a), the parties stipulate that the following discovery**
24 **was completed:**

- 25 • Plaintiff's Initial Disclosure of Witnesses and Documents Pursuant to FRCP
26 26(a)(1) was mailed to Defendant's counsel on October 2, 2023.
- 27 • Defendant's Initial Disclosure of Witnesses and Documents Pursuant to
28 FRCP 26(a)(1) was mailed to Plaintiff's counsel on September 23, 2023.

- Defendant's First Set of Interrogatories to Plaintiff were mailed to Plaintiff were mailed to plaintiff's counsel on October 12, 2023.
- Defendant's First Set of Requests for Production of Documents to Plaintiff were mailed to plaintiff's counsel on October 12, 2023.
- Defendant's First Set of Requests for Admissions to Plaintiff were mailed to Plaintiff's counsel on October 12, 2023.
- Plaintiff's First Set of Interrogatories to Defendant were mailed to Defendant's counsel on October 31, 2023.
- Plaintiff's First Set of Request for Production of Documents to Defendant were mailed to Defendant's counsel on October 31, 2023.
- Plaintiff's First Set of Request for Admissions to Defendant were mailed to Defendant's counsel on October 31, 2023.

B. Pursuant to LR 26-4(b), the parties stipulate that they need to complete the following discovery:

- The parties have agreed to extend the current scheduling order by forty five (45) days in order to complete the necessary depositions of Plaintiff and Defendant's FRCP 30(b)(6) designee(s), as well as to disclose expert and rebuttal expert witnesses.

C. Pursuant to LR 26-4(c), the parties stipulate an extension is needed for the following reasons:

- The parties agree due to the holiday season and the delays in receiving responses to pending discovery, it has become necessary to extend all discovery deadlines by forth five (45) days. This will allow additional time for the parties to complete all pending discovery.

D. Pursuant to LR 26-4(d), the parties stipulate to the following proposed schedule for completing all remaining discovery:

The parties agree to extend the discovery deadlines as set forth below:

1. The discovery cut-off deadline from 03/15/24 to **04/29/24**;

2. Amending the Pleadings and Adding Parties 12/15/23 to **01/29/24**;

3. Extend the date to disclose Plaintiff's initial expert witnesses from 12/15/23 to **01/29/24**;

4. Extend the date to disclose Defendant's initial and rebuttal expert witnesses from 01/15/24 to **02/29/24**;

5. Extend the date to disclose Plaintiff's rebuttal expert witnesses from 02/14/24 to **04/01/24**;

6. The date to file dispositive motions from 04/15/24 to **05/30/24**; and

6. The date to file the Joint Pre-Trial Order from 05/15/24 to **07/01/24**. If dispositive motions are filed, the joint pretrial order is due thirty (30) days from the entry of the court's ruling on the motions.

7. Fed. R. Civ. P. 26(a)(3) Disclosures must be included in the Joint Pre-Trial Order.

STIPULATED AND AGREED TO:

DATED this 30th day of November, 2023

DATED this 29th day of November, 2023

MURCHISON & CUMMING, LLP

VAN LAW FIRM

By: /s/ Michael J. Nunez
Michael J. Nuñez, Esq.
Nevada Bar No. 10703
Bryan J. Ure, Esq.
Nevada Bar No. 11004
Attorneys for Defendant
WALMART INCORPORATED

By: /s/ Justin G. Schmidt
Justin G Schmidt, Esq.
Nevada Bar No. 10982
1290 S Jones Boulevard
Las Vegas, Nevada 89146
Attorneys for Plaintiff

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ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE
MAGISTRATE

DATED: 11-30-2023

Katherine Haman

From: Justin Schmidt <justinschmidt@vanlawfirm.com>
Sent: Wednesday, November 29, 2023 4:37 PM
To: Conrad Voigt
Cc: Bryan J. Ure; Katherine Haman; tracy@vanlawfirm.com; rosemary@vanlawfirm.com; amely@vanlawfirm.com; raymart@vanlawfirm.com; analopez@vanlawfirm.com
Subject: Re: FW: Walmart adv. Pasley discovery extension

[EXTERNAL EMAIL]

Approved, thanks Conrad.

On Mon, Nov 27, 2023 at 11:09 AM Conrad Voigt <cvoigt@murchisonlaw.com> wrote:

Hi Justin,

Please see attached Stip to extend discovery and let us know if you have any changes.

Thanks,

Conrad

From: Justin Schmidt <justinschmidt@vanlawfirm.com>
Sent: Wednesday, November 22, 2023 5:11 PM
To: Bryan J. Ure <bure@murchisonlaw.com>
Cc: Tracy May Paloma <tracy@vanlawfirm.com>; Rosemary Harper <rosemary@vanlawfirm.com>; amely@vanlawfirm.com; raymart@vanlawfirm.com; analopez@vanlawfirm.com; Katherine Haman <khaman@murchisonlaw.com>
Subject: Re: Walmart adv. Pasley

[EXTERNAL EMAIL]

I'm amenable to an extension.

On Wed, Nov 22, 2023 at 1:37 PM Bryan J. Ure <bure@murchisonlaw.com> wrote: